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February 6, 2006

**VIA ECFS**

Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: EB Docket No. 06-36 / EB-06-TC-060: Certification of CPNI Filing  
February 6, 2006

Dear Ms. Dortch:

Supra Telecommunications and Information Systems, Inc., through counsel, respectfully submits the enclosed Customer Proprietary Network Information Certification for filing in EB Docket No. 06-36 and EB-06-TC-060. If you have any questions regarding this filing, please contact the undersigned at (202) 887-1234.

Sincerely,



Jennifer M. Kashatus

Enclosure

cc: Byron McCoy, Telecommunications Consumers Division,  
Enforcement Bureau, FCC

Best Copy and Printing, Inc. (BCPI)



Marva B. Johnson  
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February 6, 2006

I, Marva Brown Johnson, General Counsel of Supra Telecommunications and Information Systems, Inc. ("Supra") make the following statement in compliance with Section 64.2009(e) of the rules of the Federal Communications Commission ("FCC"). I am an officer of Supra and I have personal knowledge of the procedures that Supra has implemented to comply with the FCC's rules pertaining to safeguarding customer proprietary network information ("CPNI").

Supra has adopted a CPNI policy, a summary of which is provided as Attachment A. All employees and all operations are required to adhere to the attached policy. I certify that, to the best of my knowledge, this policy is adequate to ensure that Supra uses CPNI in compliance with FCC rules.

Very truly yours,

A handwritten signature in black ink, appearing to read "Marva Brown Johnson", written over a printed name and title.

Marva Brown Johnson  
General Counsel

## ATTACHMENT A

### **Supra Telecommunications and Information Services** **Customer Proprietary Network Information Policy**

As set forth in the Supra Telecommunications Employee Handbook, the Company considers failure to maintain the confidentiality of customer information as inappropriate behavior and conduct and such conduct is subject to disciplinary action, up to and including termination.

The scope of Supra's obligations related to the confidentiality of customer information includes the Federal law governing the use of Customer Proprietary Network Information ("CPNI"). It is the Company's obligation and the obligation of every Supra employee to use CPNI in accordance with the federal law and as stated in this policy.

Federal law defines CPNI as:<sup>1</sup>

- Information that relates to the quantity, technical configuration, type, destination, and amount of use of a telecommunications service subscribed to by a customer of a telecommunications carrier, and is made available to the carrier by the customer solely by virtue of the carrier-customer relationship; and
- Information contained in the bills pertaining to a telephone exchange service or telephone toll service received by a customer of a carrier.<sup>2</sup>

For example, CPNI includes information such as the type of services that the customer services and the customer's use of those services (e.g., call patterns, call volume, etc.). CPNI does not include information derived from non-telecommunications services offered to the customer.

Under federal law, absent customer consent, Supra is permitted to use, disclose, or permit access to CPNI as follows:

- (1) to protect our rights and property, our customers, and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, our services;
- (2) to provide or market service offerings within the package of services to which the customer already subscribes;
- (3) to market adjunct-to-basic services, such as, but not limited to, speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller I.D., call forwarding, and certain other features;
- (4) for the provision of customer premises equipment;
- (5) for the provision of inside wiring installation, maintenance and repair services;

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<sup>1</sup> See 47 U.S.C. § 221 (establishing the duty of common carriers to protect privacy/proprietary information of customers).

<sup>2</sup> See 47 U.S.C. § 222(h)(1)(A), (B).

- (6) for initiation, billing, rendering, or collecting for telecommunications services provided to the customer; and
- (7) as required by law, such as in response to a validly issued subpoena.

Supra may also use CPNI to provide inbound marketing, referral or administrative services to the customer for the duration of the call, if the call was initiated by the customer and the customer approves of the carrier's use to provide such service;

Consistent with the federal law, Supra does not:

- (1) use CPNI to market services to customers that are outside of the category of service to which the customer does not already subscribe.
- (2) share CPNI with affiliates or third parties for marketing purposes.
- (3) engage third parties to assist in billing and collections, administration, surveys, marketing, service delivery and customization, maintenance and operations, and fraud prevention.

If Supra seeks to market services to customers outside of the category of services, then Supra will notify customer at that time of their right to choose not to be a part of any such marketing campaign. All marketing campaigns must receive prior approval from the Vice President of Sales and Marketing and must be conducted in accordance with this policy and the rules set forth in 47 C.F.R. §62.7007. In the event that Supra has the need to enter into a joint venture or other contractual arrangement that requires Supra to disclose or to provide access to CPNI, consistent with the federal law, such arrangement shall be subject to Supra's standard non-disclosure agreement or to an alternative non-disclosure agreement subject to the review and approval of Supra's General Counsel.

Supra has designated its corporate Secretary and General Counsel as the corporate officer who acts as agent for the company and signs a compliance certificate on an annual basis stating that the officer has personal knowledge that the company has established operating procedures that are adequate to ensure compliance with applicable CPNI rules. All employees will be trained as to when they are, and are not, authorized to use CPNI. If an employee has a question regarding Supra's CPNI policy or the federal law, the employee should direct such questions and/or concerns to Supra designated corporate officer, the Secretary and General Counsel or to Supra's Vice President of Sales and Marketing.